



Control Number: 51973



Item Number: 8

Addendum StartPage: 0

DOCKET NO. 51973

RECEIVED

2021 OCT 11 PM 2:13

Application of Quadvest, LP to Amend	*	Public Utility Commission
Water Certificate of Convenience and	*	of Texas
Necessity in Harris County	*	

MOTION TO INTERVENE

Comes now the HMW Special Utility District of Harris and Montgomery Counties("HMW"), filing its Motion to Intervene, and states as follows:

I.

Docket No. 51973 seeks the unlawful decertification of a portion of HMW's Certificate of Convenience and Necessity No. 10342("CCN").

II.

HMW is named in the application as the holder of the CCN, and thus will be deprived of its possession and ownership if the application is granted. As such, it has a justiciable interest in the outcome of the proceeding. In effect, HMW is the respondent in this proceeding and entitled to intervene as a matter of right under Commission Rules 22.2(25) and (41), 22.102 and 22.103(b)(1).

Alternatively, HMW should be permitted to intervene under Rule 22.103(b)(2).

III.

Further, prejudices a substantial right of HMW to protect its CCN from unlawful interference by the Applicant. In that regard the Applicant, Quadvest, LLP, holds Certificate of Convenience and Necessity No. 11612. It is thus prohibited from interfering with the operation by HMW of its CCN. See Water Code Section 13.252.

HMW reserves the right to assert other and further evidence and argument in opposition to the application as the proceeding moves forward.

Wherefore, premises considered, HMW prays that its Motion to Intervene be granted, and for such other and further relief as the Commission deems just.

Respectfully submitted,

Law Offices of Patrick F. Timmons, Jr., P.C.

/s/

Patrick F. Timmons, Jr.
1503 Buckmann Ct
Houston, Texas 77043
o. (713) 465 7638
f. (713) 465 9527
pft@timmonslawfirm.com

Certificate of Service

I hereby certify that a true copy of the foregoing Motion to Intervene was served on the Applicant and the PUC staff on this 4th day of June, 2021, by electronic means as provided by the applicable rules of the Texas Public Utility Commission.

/s/

Patrick F. Timmons, Jr.